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5 *Court-Appointed Receiver*

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11 *Attorneys for Receiver*

12 UNITED STATES DISTRICT COURT
13 CENTRAL DISTRICT OF CALIFORNIA

14 SECURITIES AND EXCHANGE
COMMISSION,

15 Plaintiff,

16 v.

17 PLCMGMT LLC, dba PROMETHEUS
18 LAW, JAMES A. CATIPAY, and
DAVID A. ALDRICH,

19 Defendants.
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Case No. 2:16-cv-02594-TJH (FFMx)

**NOTICE OF RECEIVER'S
MOTION FOR APPROVAL OF
PROCEDURES FOR FINAL
DETERMINATION OF INVESTOR
CLAIMS AND FIRST INTERIM
DISTRIBUTION TO INVESTORS**

Judge: Hon. Terry J. Hatter, Jr.
Ctrm.: 9B
Date: UNDER SUBMISSION
Time: UNDER SUBMISSION

1 Thomas W. McNamara, as the court-appointed Receiver for Defendant
2 PLCMGMT LLC, dba Prometheus Law (“Receiver”), appointed by Preliminary
3 Injunction entered April 26, 2016 (ECF No. 20), hereby moves for an Order
4 approving (1) Procedures for the Receiver’s Final Determination of Investor
5 Claims and Pro Rata Distributions to Investors with Approved Claims which
6 procedures are set forth in their entirety as Exhibit A to the Memorandum of Points
7 and Authorities filed herewith; and (2) approval of a first interim distribution
8 totaling \$1,056,435 which shall be allocated pro rata to each investor with an
9 approved claim.

10 This motion is based upon this Notice of Motion, the Memorandum of
11 Points and Authorities, and upon such other pleadings and oral and documentary
12 evidence as may be presented at or before a hearing on the motion.

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14 Dated: December 12, 2017

MCNAMARA SMITH LLP

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16 By: /s/ Andrew W. Robertson
Andrew W. Robertson
Attorneys for the Receiver
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CERTIFICATE OF SERVICE

I hereby certify that on December 12, 2017, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of the filing to all participants in the case who are registered CM/ECF users.

I further certify that I have caused the foregoing to be mailed by First Class Mail, postage paid, to the following non-CM/ECF participants:

Beverly Yadao Palacio
1130 South Flower Suite 310
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Santiago Cuellar
1709 Christian Court
Weslaco, TX 78596

/s/ Andrew W. Robertson
Andrew W. Robertson